

Richard E. Welsh
108 North St., NE
Leesburg, VA 20176

June 1, 1998

Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: Complaint

Dear Mr. Noble:

This is a complaint pursuant to 11 C.F.R. Sect. 111.4 *et seq.* Enclosed, please find a copy of an article from *The Wall Street Journal* of May 28, 1998. The relevant sections are noted by marginal annotation.

The complaint is against individuals C. Boyden Gray, Jeanne Fletcher, and Sen. Trent Lott; and the multicandidate committee, New Republican Majority Fund.

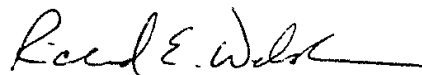
The violations alleged, and probable violators of each, are:

- 11 C.F.R. Sect. 110.4(b) (Contribution in the name of another): Gray, Fletcher
- 11 C.F.R. Sect. 110.5(b) (Annual limitation of contribution by individual): Gray
- 11 C.F.R. Sect. 110.1(d) (Excessive contributions by individual): Gray, New Republican Majority Fund, Sen. Lott

Further, in the case of Gray, at least, the violations appear to be knowing and willful, if the statements attributed to both him and Fletcher by the *Journal* are even approximately correct. As former White House Counsel, as well as his many other political assignments, Mr. Gray cannot credibly claim innocence of black-letter election law. Given this striking circumstance, it would behoove the Commission to make this one of its higher-priority cases, in its allocation of investigative resources.

Thank you.

Sincerely yours,



Richard E. Welsh

THE WALL STREET JOURNAL.

© 1998 Dow Jones & Company, Inc. All Rights Reserved.

VOL. CCXXXI NO. 103 EF:AWO ***

THURSDAY, MAY 28, 1998

INTERNET ADDRESS: <http://wsj.com>

75 CENTS

The Money Trail

Who Are Those People Donating to Politicos? Secrets of a GOP PAC

Hedge Funds Give, and Get: Shipbuilder Bids for Aid; Tennis Pro Stays in Touch

A Word in Trent Lott's Ear

By Gabe Hirt and Phil Kuntz
Staff Reporters of The Wall Street Journal
WASHINGTON—In the summer of 1996, hedge-fund managers placed a big bet on the Republican Party.

In mid-June, Tiger Management LLC's Julian Robertson gave \$100,000 to the GOP. Two weeks later, Stan Druckenmiller of Soros Fund Management LLC upped the ante, giving \$250,000 to the party. That same day, an obscure political-action committee headed by Senate Majority Leader Trent Lott began recording a harvest of 5,000 contributions, the maximum allowed by law, from a Who's Who of hedge-fund celebrities.



Vince Rossi of Turnberry Capital Management in Greenwich, Conn., pointed up. So did hedge-fund legend Harvey Sandler, his long-time partner Betty Lewis and Mr. Lewis's wife, Barbara. Jack Nash, another pioneer hedge-fund investor, also joined Sen. Lott's \$5,000 club that summer, as did investor Lewis Ranieri. By Labor Day, Sen. Lott's New Republican Majority Fund had raked in \$165,000 in \$5,000 checks from financiers of various stripes.

Why the largess? Some, such as Mr. Ranieri, say they can't recall why they gave. Others, like Mr. Sandler, don't remember giving at all. "If I did it," he says, "it was because somebody else asked me." Mr. Rossi says it may sound "stupid or corny," but "I fundamentally believe you don't have a right to complain if you don't participate."

But perhaps there was another force at work. That fall, Sen. Lott found time in the Senate's end-of-the-session crush to take up the National Securities Markets Improvement Act. Among other things, the bill lifted hedge funds' limit of 99 U.S. investors, allowing money managers of these private investment funds to cast a wider net for capital.

After the bill passed, Mr. Robertson gave another \$100,000 to the RNC. A spokesman says his giving had nothing to do with the legislation. A Soros spokesman says the same about Mr. Druckenmiller's contribution: "We took no interest in the legislation whatsoever."

Campaign Reform

Once again, the House of Representatives is considering proposals to overhaul the crazy campaign-finance system. And once again, there is little chance Congress will enact anything. In the Senate, Sen. Lott himself has been a leading pallbearer for proposed reforms, deep-sinking a bill fashioned by a GOP colleague, Sen. John McCain of Arizona. Key members of Congress have made it clear they would rather retain the current incumbent-friendly system than significantly limit donations. As Sen. Lott put it last year, "writing big checks to politicians you like is 'the American way.'"

So donors with deep pockets will remain a fixture of American politics.

But who are they? Why do they give? What motivates them—ideology, partisanship, parochialism or something else? Are they the predators of the political system, buying influence through legalized bribery? Are they victims, pawns of money-hungry politicians too powerful to refuse? Or are they simply patriots seeking nothing more than a stake in the system, supporting candidates in whom they believe?

The List

To find out, The Wall Street Journal took a close look at a defined sample of big donors: everyone who contributed the \$5,000 maximum to Sen. Lott's New Republican Majority Fund in any of the three years after the GOP took control of Congress in 1995. Sen. Lott is a natural draw for big contributors. His fund, which supports other candidates and helps finance the Mississippi Republican's political activities, reflects that. Dormant for years, it has raised \$5.4 million since being reactivated in 1995, when Sen. Lott began his leadership ascent as majority whip.

A total of 144 individuals contributed the \$5,000 maximum to the senator's PAC in 1995, 1996 and/or 1997, for a total of \$850,000. The Journal tried to get in touch with all of these donors and identify their business interests, political leanings and anything else that might have motivated them to give. Some couldn't be reached. Sen. Lott declined to discuss contributions to his PAC and didn't respond to written questions.

Almost all of those reached say they were moved to give primarily by kinship with Sen. Lott's conservative ideology or by a long-standing friendship. For many, that appears to be the case. But the Journal's analysis shows that four out of five donors to the Lott PAC had identifiable stakes in specific programs and policies pending before the government. "I gave because I have an interest in how he votes. Please Turn to Page A14, Column 1."

Following the Money: A Look at Contributors To a Trent Lott PAC

Continued from Page 1 "The PAC issues," says John Haddock, shipping magnate in Long Island, N.Y., "is self-interest. More than six dozen of the donors stood to benefit from specific legislation or other official actions favorable to their business interests, the Journal analysts found. Half of those donors' interests got sidetracked from Sen. Lott himself. For example, the lobbyist was the chief sponsor of an obscure bill imposing uniform standards on states for labeling asbestos having been rebuilt from wrecks. His PAC entered \$5,000 from Sherry Sharp, the wife of Circuit City Stores Inc. Chairman Richard Sharp. The husband, Va., company's used-car subsidiary, Max, and the heavily Republican auto-dealer lobby favor the bill. The measure, which is opposed as too lax by consumer groups and the National Association of Attorneys General, is pending in the Senate after having cleared the House. The PAC declines to comment.

Sen. Lott's top donors, nearly all well-to-do, are nonetheless an eclectic bunch. Hedge-fund managers and financiers account for more than a third of them, the group includes lobbyists for industries ranging from peanuts to Playtex. There is also actress Marla Schuchman, a New York diamond dealer, and a Texas chicken farmer. Lott once opined that "giving amounts of money to a politician is all-American as far as I'm concerned. . . . If you give them money, they return your calls."

There are also some other well-known names, such as money manager Meyer Berman in Boca Raton, Fla., who is pushing Congress to overhaul the New York Stock Market. Relative to some of the PAC's donors, Berman says, "Lott strikes me as a relatively reasonable person."

Some of the donors are so wealthy they barely remember giving \$5,000, which represents six weeks' gross pay for the average American family. Philip Merrill, publisher of the Washingtonian magazine, became angry when told that campaign records showed him giving \$5,000. "I have never contributed to any PAC in my life! I don't believe I ever contributed to Trent Lott!" Later, he allowed that it is possible he did give, but forgot.

Others regret being part of what they consider a tainted political system. "It's gotten out of hand," says Ronald Sandmeyer, chairman of Sandmeyer Steel Co. in Philadelphia. "We have become a government of special-interest groups." The system "creates cynicism, skepticism, all of the above. I'm part of it. Absolutely."

The Lott PAC wasn't immune to some of the same sorts of campaign-finance troubles that plagued Democrats in 1996, when individuals of questionable background contributed to the party to aid President Clinton's re-election effort. A handful of Lott-PAC donors have or had legal entanglements.

Lobbyist Vernon Clark is under federal fraud indictment in Boston in a public-corruption probe; he has pleaded not guilty. Andrew Bressman pleaded guilty in a New York court to grand larceny in con-

nection with failed brokerage firm A.R. Barron & Co. Contributor Hedi Lieberman is the wife of Victor Tencher of Westport, Conn., who served 10 months in prison for securities fraud; an associate says her husband was behind her contribution. Finally, contributor Alfred S. Palagonia and his employer, D.H. Blair & Co., paid a \$25,000 fine last year to settle improper-trading charges brought by the National Association of Securities Dealers.

While most of Mr. Lott's big donors are wealthy, Federal Election Commission records also list one secretary, Jeanne Fletcher, as contributing \$5,000 in March 1997. She works for C. Boyden Gray, who was counsel to President Bush. When asked, Ms. Fletcher and Mr. Gray both say the money actually came from him. They call it an innocent mistake.

Campaign law requires the actual source of the money to be disclosed in FEC reports. The provision helps enforce a \$25,000 cap on individuals' total annual giving to federal campaigns. A closer look at FEC records shows that Mr. Gray appears to have exceeded that cap in three of the past four years. Nearly \$17,000 in contributions were attributed to Ms. Fletcher, but she and Mr. Gray say the money was really his. Counting Mr. Fletcher's donations, Mr. Gray gave more than \$50,000 for 1997 campaigns, about \$25,000 for 1995 and \$31,000 for 1996. FEC records show \$25,000 for 1997.

A frequent television commentator on Democratic ethics, Mr. Gray says Ms. Fletcher handles his finances, has authority to sign his checks and sometimes transmits his campaign donations. He and Ms. Fletcher say that may explain the incorrect reports. They say they previously asked various campaigns and the FEC to correct mistakes in the reports for 1994 donations but learned through inquiries from The Wall Street Journal that they weren't successful. Now Mr. Gray's office is asking campaigns to refund excess donations and to attribute all remaining Fletcher donations to Mr. Gray.

"There are times I frankly say, 'Thank God there are limits,'" Mr. Gray says. Mr. Gray is now a lobbyist. Among his clients: Tiger Management, Mr. Robertson's hedge-fund company. Tiger hired Mr. Gray to lobby for the new investor rules passed in 1996.

A few businesses are especially well represented among top donors to the Lott PAC.

High Tech

Two issues have helped Sen. Lott's standing in Silicon Valley. Many executives there want protection from shareholder suits, and some want Congress to change "encryption" rules that don't permit them to export cutting-edge information-security technology that is difficult for law-enforcement agencies to crack.

Technology and telecom executives accounted for \$75,000 in \$5,000 gifts to Sen. Lott's PAC from 1995 through 1997.

In 1995, Sen. Lott helped rally the Senate to override a Clinton veto of the securities-litigation bill, winning tech firms some protection against federal suits. Plaintiffs' lawyers, however, found a loophole by turning to state courts, and now Sen. Lott is supporting an industry effort to close that loophole. He also is trying to broker an encryption compromise.

"He's been very helpful from his leadership position to make sure we've been able to do what we want to do," says James Bartleside, who has known Mr. Lott since their future wives were sorority sisters at Ole Miss.

James and Sally Bartleside gave the PAC \$5,000 each, and last fall Mr. Bartleside hosted a fund-raiser for the PAC in Palo Alto, Calif. Mr. Lott told attendees of his interest in litigation reform and the encryption issue. "I thought he went over very well," says former Hewlett-Packard Co. Chairman John Young, who gave \$5,000.

Also helping coordinate the fund-raiser was Floyd Kyramme, a technology venture-capitalist who lobbies for the industry. Mr. Kyramme was impressed with Sen. Lott last summer while lobbying him on litigation reform. "He was quite motivated to be helpful," recalls Mr. Kyramme. Soon after, he sent Sen. Lott, at the suggestion of Michael Boardman, a lobbyist who used to be Sen. Lott's chief counsel.

"We're interested in passing some legislation," Mr. Kyramme explains. "I felt he was on the right wave length."

"We have become a government of special-interest groups," says a businessman who contributes. "The system 'creates cynicism, skepticism, all of the above. I'm part of it, absolutely.'"

A similar pattern appears in Sen. Lott's relationship with John Kluge, the billionaire communications investor. During consideration of a telecommunications bill two years ago, Sen. Lott shepherded an amendment giving LIDS WorldCom, a long-distance service based in Jackson, Miss., a competitive edge over major carriers. Mr. Kluge was then LIDS WorldCom's chairman.

In the spring of 1996, shortly after the bill passed, Mr. Kluge lent his New York apartment to Sen. Lott's PAC for a mixer that raised tens of thousands of dollars from Kluge associates, including 520,000 from new members of Sen. Lott's \$5,000 club. And last fall, Sen. Lott flew to Charlottesville, Va., in a helicopter made available by Mr. Kluge's Metromedia Co. for another fund-raiser, at Mr. Kluge's 5,000-acre estate. Following FCC rules, the PAC paid Metromedia \$2,417 for the ride.

Meanwhile, Mr. Kluge is branching out. Metromedia recently took control of a small New Jersey power marketer. Expansion plans are in the works to capitalize on an effort Mr. Lott supports to loosen utility regulation.

Spokeswoman for Mr. Kluge says he doesn't know of a house of crossing palms to get a favorable vote. He contributes to a list of politicians as long as your arm. He truly believes it's part of the process.

Shipping

A longtime supporter of shipping and shipbuilding, Sen. Lott receives significant support from those industries. In some cases, the money has bought contributors access to the Senate majority leader.

Shipping executive William Chatter, of Maryland-based American Automar, paid \$5,000 last year to attend a discussion with Sen. Lott about maritime issues. About 25 shipping types sat around an oblong table nibbling finger-food.

Sen. Lott sat there and went around the table and listened to what we had to say," Mr. Chatter says, recalling the meeting.

"What attracted me about it was that it was billed to be a small group."

Mr. Raggio of Sealift Inc. on Long Island, also attended. He says he had been told by someone - he doesn't recall whom - that "if you contribute to this, you'll get invited to this get-together."

The Senate Ethics Committee discourages members from charging people to participate in policy discussions. "Offering campaign contributors access to those discussions in direct return for campaign contributions creates the appearance that contributors receive special access to members and thereby exer-

cise undue influence," the panel said in 1987.

Some of Mr. Lott's top donors got more than just access.

Consider World City Corp. Since 1990, the New York-based company has pushed a proposal to build the world's largest cruise ship, a 6,200-passenger behemoth featuring three hotels, a town of shops, lined streets and a 2,000-seat movie theater. The stumbling block has been the federal Maritime Administration, which has doubts about the project's feasibility and is refusing to approve a \$1 billion loan guarantee.

The company and its main proponents used to be fairly modest donors, giving no more than occasional \$500 gifts. Then in early 1996, the Maritime Administration formally rejected World City's application for the loan guarantee. A lobbying frenzy ensued.

In the next two years, World City and its supporters gave nearly \$20,000 to candidates and committees from both parties. Much of it went to members of Congress who signed letters pressing the Clinton administration to reconsider.

Most of the \$40 million-plus spent developing the project came from Kent Roster, founder of Norwegian Cruise Line, says World City Chief Executive John Rogers. But World City says all campaign donations came from U.S. funds and thus didn't violate laws against foreign contributions.

Through donations to his PAC and campaign, Sen. Lott received more money than did any other congressional candidate. The timing may be noteworthy.

In the spring of 1996, World City persuaded several Mississippi shipbuilding-related companies to lobby the senator to support the project. On April 25, 1996, Sen. Lott met with World City officials. Two weeks later, two proponents of the project sent the PAC \$5,000 each.

The following month, World City tried to get the senator to attend a meeting it had set up with Federico Pena, then the secretary of transportation, to "muster some significant political support at that meeting," as a Mississippi company put it in a letter to Sen. Lott. On July 8, 1996, a Lott aide attended a meeting between Mr. Pena and World City officials; the next day, the senator wrote Mr. Pena a glowing letter about the project. "It is a significant opportunity for America to show its leadership as both a shipbuilding and a tourism nation," he wrote.

Sen. Lott has "been very helpful" from his leadership position, to make sure I've been able to be heard," says Netscape's James Barksdale.

Later that month, Sen. Lott was lobbied to support a measure the company wanted to help it secure financing. On Aug. 7, World City supporters sent his PAC another \$10,000. A further \$14,000 came over the next eight months.

"Increasingly, we saw it as a way of life in Washington," World City Chief Executive Rogers says of the donations. "Obviously, what we want to do is create a climate in Congress where people are aware of the project. But the money was 'not central' to the lobbying effort, Mr. Rogers adds. "We are not out there saying, 'See this check? You wrote this letter, you get this check.'"

The coincidence of the timing between donations and official action "bore a somewhat makes it look that way."

Committee advisers implored to be wary. "A decent interval of time should be allowed to lapse so that neither party will feel that there is a close connection between the two acts," the committee told senators in 1991. Sen. Lott was a member of the panel at the time.

Lobbyists

In all, nearly 20 lobbyists and consultants made \$5,000 contributions to Sen. Lott's PAC. Many have close ties to him.

James H. Johnson, for example, has known Sen. Lott since their days together at the University of Mississippi. He later worked as an aide to the senator, then became the Lott PAC's chief fund-raiser.

Today Mr. Johnson is part of a circle of Mississippians and former Lott aides making their way in Washington as lobbyists known to have the Senate majority leader's ear. After leaving the PAC, Mr. Johnson formed his own lobbying business and became "of counsel" to the lobbying firm founded by one of Mr. Lott's Mississippi associates, Haley Barbour, the former GOP chairman.

After Sen. Lott became majority leader in 1996, his lobbyist friends exulted. "The environment for developing new business is the best that it's ever been," said Lanny Griffin, another Mississippiian in Mr. Barbour's lobbying firm. Mr. Boland, who is in the lobbying business with another Lott friend named Peter Madigan, told a reporter at the time, "Life has always been good, but it got a lot better recently."

All the name partners of their firms - Barbour, Griffin & Rogers and Boland & Madigan - have contributed to Sen. Lott's PAC and encouraged clients to do so. Simultaneously, they lobby him and

function as his kitchen cabinet, dispensing political advice.

"I encourage them all" to contribute, says Mr. Barbour, explaining that the money helps the GOP retain control of Congress, and this favors his clients. "It's a hell of a lot easier going into the meeting," he says, "when you've got a chairman that agrees with you."

Barbour partner Edward Rogers is one of Mr. Lott's biggest fund-raisers. He was behind a \$5,000 donation from California investor Sam Barnish, who wrote a check after hearing a Lott talk about cutting inheritance taxes. "I figured, what the heck - let's support him and see if he can deliver."

Mr. Barnish says. The donor was disappointed. "I don't think he went far enough," he says, because estate taxes were merely cut, not eliminated.

Many of their clients haven't fared too badly on Capitol Hill. Mr. Johnson has represented D.H. Blair Investment Banking of New York, whose chairman, J. Morton Davis, contributed to Mr. Lott's PAC in 1995 and 1996. Last year, Mr. Johnson lobbied for a targeted capital-gains provision sought by Mr. Davis, which passed with the support of Sen. Lott and others.

Mr. Johnson declined to comment, and Mr. Davis didn't return phone calls.

An issue of interest to some LottPAC donors last year was the Medicare payment system. Shortly after Mr. Barbour left his GOP post and rejoined his lobbying firm, he lobbied for the Lott PAC firm last year, the Lott PAC got \$5,000 from a new Barbour client: Robert Ekins, CEO of Integrated Health Systems Inc. in Owens Mills, Md. The nursing-home company also retained another lobbying firm, U.S. Strategies Corp., of Alexandria, Va., whose lobbyist gave \$15,000 to Sen. Lott's PAC. IHS was lobbying on changes in Medicare's payment system. After some changes were contained in last year's budget bill, IHS executive was quoted as saying IHS was "very excited under the new system."

Also interested in the Medicare bill was Bruce Lunsford, CEO of Vencor Inc. in Louisville, Ky., operator of nursing homes and long-term hospitals. He contributed \$5,000 to the urging his lobbyist, Mr. Madigan, but congressional aides who worked on the bill say Vencor didn't fare very well. Mr. Lunsford didn't return a call seeking comment.

Metromedia
President, John

Kluge "contributed to a list of politicians as long as

your arm. He truly believes it's part of the process," says spokeswoman sayss

M. Barbour also represents the tobacco industry, a major source of contributions for the GOP. Last summer, he helped with approval of a provision that would have saved cigarette makers tens of billions of dollars under the proposed tobacco liability settlement. Although typically a timid conservative, the proposal was supported by Sen. Lott, whose office received a \$5,000 donation from the tobacco industry. Barbour also secured a Bible for the Twisted Pathway Motel in Cos. CEO Geoffrey Morris, another Barbour client. The Bibles had no caption.

...sometimes hope the access their
...prompt action. Jeremy Jacobs, the
...N.Y., food-concessions concern
...North Ops., hired another former
...opening National Park Service
...relative bidding. The aide, John
...ed Mr. Jacobs to give \$5,000 to

The gift got Delaware North's in-house lobbyist, Bill Bissett, into a small dinner with Mr. Loft at the City Club in Washington. "We thought it would be a chance to get the issue in front of Sen. Loft," Mr. Bissett says. "We wanted to see it passed."

A Few Old Friends

Not at Mr. Lott's contributors' knee because they want legislative action. Kathleen Kemper just likes to be part of the Washington scene. A 55-year-old feminist coach to some of Washington's best-connected political operatives, she twice donated the maximum \$5,000 to Sen. Lott's PAC after meeting the wife of its chief fund-raiser at a political event. It's all "networking," Ms. Kemper says. "I have very no intrinsic interest in politics." But she devours newspapers "so I have things to talk about with my pals." She also raises money herself to sponsor bills. "I do it for fun, but I like to take the work out

political figures

"Washington has been, very good to me. I have a very good ten-cent business. So I'm happy to give something back to the system," says Mr. Kemper, who says she is, "not strictly Republican and does not like both parties." A "typical" friend to both parties, she says, "is people I like who are my friends."

A handful of big Lott donors are longtime friends. Among them is Roy Newman, a Gallup, Miss.

dealer in manography and oak furniture. He keeps a picture of the senator in his office, just above a photo of Ronald Reagan. The septuagenarian Mr. Newman has known his friend for three decades and says he is proud his friend hasn't forgotten his Mississippi roots.

Mr. Newman made a \$5,000 donation to Sen. Lot's PAC in 1995 and sent another \$5,000 in 1996. "I probably need to make another one," he says. "You ought to encourage good men. It's your duty to support them."

A14 THE WALL STR

Trent Loti's \$5,000 Club

The following individuals donated the maximum allowable amount (\$5,000) to Senate Majority Leader Trent Lott's political action committee, the New Republican Majority Fund, in one or more of the three years after the 2002 GOP took control of Congress:

January 1995, the Federal Election Commission's records, supplemented by other public records and interviews.

Bamien, Sam, San Mateo, Calif., Investor, C. **B**arbour, Helen B., Yrebo, N.C., Angel Group

James Bartsdale, Mountain
City, Miss., *Lobbyist/Bartbour,*
Griffith & Rogers
Yew, Calif., *Netoscope*
Communications Corp., CEO

[illegible]

Buergerman, David, Fort Worth, Texas, *Investor/Leas Pacific Group, which controls Continental Airlines*
Breastman, Andrew, Cliftside Park, N.J., *A.R. Byron & Co. Inc., president*
Browning, Peter C., Hartsville S.C., *Sonoco Products Co., president*
Burt, Richard R., Bethesda, Md., *Investor, former ambassador to Germany*

C Carroll, Philip, Houston, Texas, Shell Oil Co. CEO
Cassidy, Thomas J., Norfolk, Mass., Harvard Institute for
Int'l Development
Charlier, J. William, Potomac, Md., American

Chairman: *Alvin Karpman, Constellation Brands, Inc., 1000 N. Yates Rd., White Plains, N.Y. 10604*
President: *John L. Slos, Constellation Brands, Inc., 1000 N. Yates Rd., White Plains, N.Y. 10604*
CEO: *Charles C. Ciso, Ciso Systems Inc., 650 N. Main St., Elmira, N.Y. 14901*
Vice President: *John W. Bodin, Constellation Brands, Inc., 1000 N. Yates Rd., White Plains, N.Y. 10604*
Investor Relations: *Barbara A. Belsbach, Constellation Brands, Inc., 1000 N. Yates Rd., White Plains, N.Y. 10604*
Public Relations: *Elaine J. Polonius, Constellation Brands, Inc., 1000 N. Yates Rd., White Plains, N.Y. 10604*
General Counsel: *Vernon A. Pagnoni, Constellation Brands, Inc., 1000 N. Yates Rd., White Plains, N.Y. 10604*
Sales: *Vern Clark & Associates, Constellation Brands, Inc., 1000 N. Yates Rd., White Plains, N.Y. 10604*
Marketing: *Carman, Huntsville, Constellation Brands, Inc., 1000 N. Yates Rd., White Plains, N.Y. 10604*
Finance: *Frank J. Huntley, Constellation Brands, Inc., 1000 N. Yates Rd., White Plains, N.Y. 10604*
Operations: *Scott D. Woodside, Constellation Brands, Inc., 1000 N. Yates Rd., White Plains, N.Y. 10604*
Manufacturing: *Constellation Brands, Inc., 1000 N. Yates Rd., White Plains, N.Y. 10604*

Chait, J. Marton, Lawrence,
H. V., D.H. Bair Investment
Banking chairman
Sittingburg, Emmet G.,
Columbus, Miss. Valley
Construction Co.
Sittingburg, Gill III, Columbus,
Ga. Valley Construction Co.
Sittingburg, Gill Jr., Columbus,
Ga. Valley Construction Co.
Sittingburg, R. Bay Village,
Ohio, American Medical
Pharm Inc.
Sittingburg, Glenn R., Fructio
Investment, Ga.
Sittingburg/Plaintiff Capital Inc.
Investment, Gary K., New
York, Investor/Greynay

Erde, Will, Austin, Texas.
Texas Manufactured
Housing Assn.
Eisenberger, Jeffrey M.,
Brooklyn, N.Y., Investment
Analyst, Formerly with
Latier Assoc.
Elkins, Robert N., Owings
Mills, Md., Integrated Health
Services Inc. CEO

Fletcher, Jeanne D., Washington, D.C., Lobbyist
Boyd Gray's secretary at
Wilmet, Culter & Pickering;
Gray says the money was
actually his.

Chase, Md. Lobbyist/
French & Co.
Friedman, Emanuel,
Washington, D.C.
Investor/Friedman Billings
Ramsey & Co.
Friedman, Esther, Kew
Gardens, N.Y., Retired
Friedman, Jack, Kew
Gardens, N.Y., R. Tyron
Moving Home
Friedman, Mayer, New York
Student

Gallagher, Charles E.,
New York, *Retired*; husband
Stephanie Gallagher
Gallagher, Stephanie,

new York, World City Corp. executive
Garcia, Carmen F.,
Virginia Beach, Va., Son
of Edward S. Garcia
Garcia, Edward S.,
Virginia Beach, Va.,
Developer/SSG Enterprises

Investor/Gabriel Capital
 Merrill, Philip, Arnold, Md.
 Capital/Gabriel
 Communications
 Emsi S. Edna.
 Capital Inc.
 Parite R. D.C. Wile of
 Washington, D.C. Wile of
 Virginia, James R. New
 Herbert S. Miller
 James R. New
 L.A. Forest-
 Ran Copper & Gold
 H. New
 L.A. Wile of James
 H. Hoffert

Young, John, Portola, Calif.,
Hewlett-Packard Co., former
CEO

R
Raggio, John, Manhasset, N.Y., Sealfin Inc. executive
Ranieri, Lewis S., Merrick, N.Y., Investor/Ranieri & Co.
Readmond, Ronald W., Trappe, Md., Former executive/Charles Schwab & Co.
Rogers, Ed, Washington, D.C., Lobbyist/Barbour Griffith & Rogers
Rogers, Edwina, Alexandria, Va., Investor
Rogers, John S., New York, World City Corp. CEO
Rohr, George, New York, Investor/NCH Advisors
Rosenwald, Lindsay, New York, Investor/Castle Group
Rosenwald, Rivka, New York, Investor
Ross, Vince, Greenwich, Conn., Investor/Timberly Capital Management L.L.C.
Roth, Millcent, Washington, D.C., Retired
Ryan, Patrick G., Winnetka, Ill., Aon Corp. CEO

Investor/Gabriel Capital
 Merrill, Philip, Arnold, Md.
 Capital/Gabriel
 Communications
 Emsi S. Edna.
 Capital Inc.
 Parite R. D.C. Wile of
 Washington, D.C. Wile of
 Virginia, James R. New
 Herbert S. Miller
 James R. New
 L.A. Forest-
 Ran Copper & Gold
 H. New
 L.A. Wile of James
 H. Hoffert